

AB:AA
F. #2021R01071

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

RICHARD ABREU and
PRINCE CHEA,

Defendants.

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AFFIDAVIT AND COMPLAINT
IN SUPPORT OF AN
APPLICATION FOR AN
ARREST WARRANT

21-MJ-1423

(T. 18, U.S.C., §§ 2119(1), 2, 3551
et seq.)

EASTERN DISTRICT OF NEW YORK, SS:

Michael McCarthy, being duly sworn, deposes and states that he is a Detective with the New York City Police Department (“NYPD”), duly appointed according to law and acting as such.

On or about September 29, 2021, within the Eastern District of New York, the defendants RICHARD ABREU and PRINCE CHEA, together with others, with intent to cause death and serious bodily harm, did knowingly and intentionally take a motor vehicle that had been transported, shipped and received in interstate and foreign commerce from the person and presence of another, to wit: John Doe #1, a person known to the deponent, by force and violence and by intimidation.

(Title 18, United States Code, Sections 2119(1), 2 and 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:¹

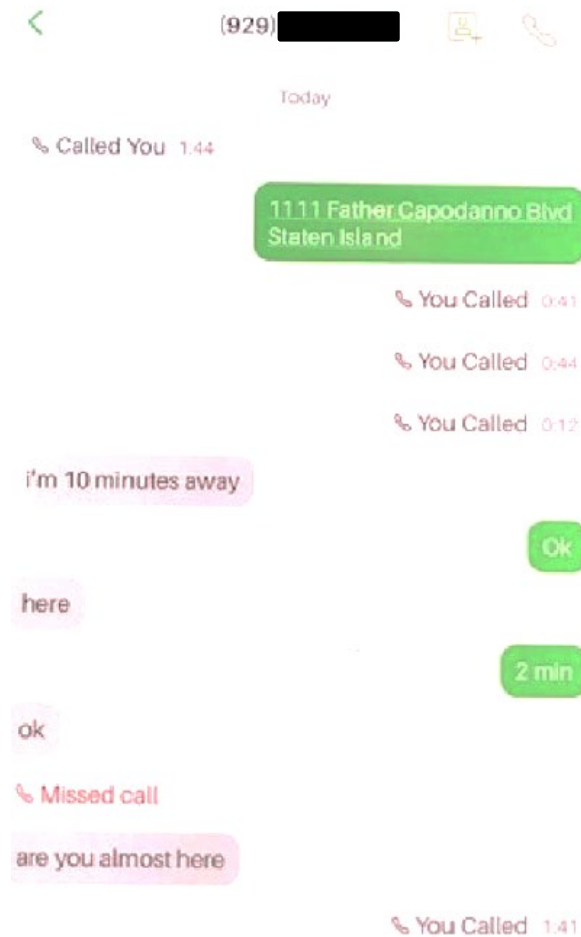
1. I am a Detective with the NYPD's Firearms Suppression Section, Triggerlock Unit and have been for six years. I also serve as a Task Force Officer with the Bureau of Alcohol Tobacco and Firearms. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file and surveillance camera videos; and from reports of other law enforcement officers involved in the investigation.

The September 29 Carjacking

2. On September 29, 2021, at approximately 7:30 p.m., John Doe #1 called to report that he was robbed of a motor vehicle at gunpoint by two men. Doe told law enforcement that he was attempting to sell a vehicle. The vehicle was a gray 2014 BMW sedan with Texas license plate 1BG1473. Doe told law enforcement that he had listed the car on online selling platforms Facebook Marketplace, OfferUp, and Craigslist.

3. John Doe #1 and the perpetrators arranged for the sale of the vehicle by phone and text message. Doe and a perpetrator exchanged calls and messages and agreed to meet near 1111 Father Capodanno Blvd, Staten Island, New York, as depicted below.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.



4. At the agreed upon location, John Doe #1 met the perpetrators. The perpetrators got in the car and held a firearm to the back of the Doe's head and told him to get out of the car or that he would be killed. Doe exited the vehicle, and the perpetrators drove away.

5. Law enforcement canvassed the area for surveillance cameras and found footage of two individuals bearing resemblance to CHEA and ABREU at the approximate time and place of the carjacking. CHEA is recognizable because he is wearing a dark hoodie with a red logo and animal print pants with a light-colored stripe and light-colored sneakers at the time

of his arrest, as depicted below (left). ABREU is recognizable because he is wearing dark clothing with yellow-bottomed sneakers at the time of his arrest, as depicted below (right). The individuals captured on the surveillance footage are wearing similar clothing, as described in more detail below.



6. On September 29, 2021, at approximately 6:54 p.m., CHEA and ABREU are seen in the approximate location of Hempstead Ave between Freeborn St and Olympia Blvd in Staten Island, New York, as depicted below (left). Shortly thereafter, at approximately 7:00 p.m., Chea and Abreu are seen near the corner of Lincoln Avenue and Father Capodanno Blvd in Staten Island, New York, as depicted below (right). This on the same block of the 1111 Father Capodanno Blvd location where John Doe #1 and the perpetrators discussed meeting.

7. Based on my review of the surveillance videos and familiarity with CHEA and ABREU's appearance, I believe that the below still images show CHEA and ABREU. CHEA appears to be wearing a dark hoodie with a red logo (in the image on the left) and patterned pants with a light-colored stripe and light colored sneakers (in the image on right). Moreover, AREBU is wearing dark clothing with yellow-bottomed sneakers (in the image on right). CHEA and ABREU were arrested wearing similar clothing.



8. Shortly after the robbery, law enforcement contacted BMW to help determine the location of the stolen car through the BMW Assist navigation and security system. BMW informed law enforcement that the car was in motion on Dudley Street between Warren Street and Washington Street in Jersey City, New Jersey. Shortly thereafter, CHEA and ABREU were stopped by law enforcement officers in the stolen car and were arrested at 100 Dudley Street in Jersey City, New Jersey. At the time of the arrest, law enforcement officers searched

CHEA and ABREU incident to arrest. Among other items, law enforcement found a firearm in the vehicle, specifically a black Taurus PT-840C .40 caliber firearm.

9. On or about September 30, 2021 at approximately 1:20 a.m., after CHEA's arrest, he received a Miranda warning and agreed to speak with detectives. CHEA then admitted to carjacking the victim. Specifically, CHEA said that, although no gun was pointed at John Doe #1, "we just told him to get out of the car and he got out the car."

10. The stolen vehicle, a BMW, was transported, shipped and received in interstate or foreign commerce.

11. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that CHEA and ABREU were the perpetrators of the September 29, 2021 carjacking.

12. WHEREFORE, I respectfully request that an arrest warrant be issued for the defendants PRINCE CHEA and RICHARD ABREU so that they may be dealt with according to law.

/s/ Michael McCarthy

TAM

Michael McCarthy
Detective
New York City Police Department

Sworn to before me by telephone this
20th day of December, 2021

Taryn A. Merkl

THE HONORABLE TARYN A. MERKL
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK